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MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

Phillip Gregory

(Enter above the full name
of the plaintiff or plaintiffs in
this action)

vs.

County of Cook
John Stroger
Michael E. Sherahan
Callie Baird
Sgt Latham
C.O. fulson

(Enter above the full name of ALL
defendants in this action. Do not
use "et al.")

CHECK ONE ONLY:



COMPLAINT UNDER THE CIVIL RIGHTS ACT, TITLE 42 SECTION 1983
U.S. Code (state, county, or municipal defendants)



COMPLAINT UNDER THE CONSTITUTION ("BIVENS" ACTION), TITLE
28 SECTION 1331(a) U.S. Code (federal defendants)



OTHER (cite statute, if known)

**BEFORE FILLING OUT THIS COMPLAINT, PLEASE REFER TO "INSTRUCTIONS FOR
FILING." FOLLOW THESE INSTRUCTIONS CAREFULLY.**

CONT.

DEFENDANTS

L.T. BROGAN

JOHN DOE #1

JOHN DOE #2

JOHN DOE #3

JOHN DOE #4

(2).

I. Plaintiff(s):

- A. Name: Phillip Gregory
- B. List all aliases: _____
- C. Prisoner identification number: 2004-0032823
- D. Place of present confinement: COOK County D.O.C.
- E. Address: 2700 S. California Ave. Chi-IL

(If there is more than one plaintiff, then each plaintiff must list his or her name, aliases, I.D. number, and current address according to the above format on a separate sheet of paper.)

II. Defendant(s):

(In A below, place the full name of the first defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Space for two additional defendants is provided in B and C.)

- A. Defendant: County of COOK, Municipality
Title: Administrative Municipal Corporation
Place of Employment: 118 N. Clark St. Chi-IL 60602
- B. Defendant: John Stroger
Title: President COOK County Commissioners
Place of Employment: 118 N. Clark St. Chi-IL 60602
- C. Defendant: Michael f. Sheahan
Title: COOK County Sheriff
Place of Employment: Richard J. Daley Center
CHI-IL 60602

(If you have more than three defendants, then all additional defendants must be listed according to the above format on a separate sheet of paper.)

D). Callie Baird
Director C.C.D.O.C.
2700 S, California Ave.
Chicago, Illinois 60608

E). Sgt. Latham
3-11- Correctional Officer Supervisor
2700 S, California Ave.
Chicago, Illinois 60608

F). C. O. Fulson
3-11- Correctional Officer
2700 S, California Ave.
Chicago, Illinois 60608

G). Lt. Brogan
3-11- Correctional Officer Supervisor
2700 S, California
Chicago, Illinois 60608

(H-I-J-K) John Doe's #1-#4
Correctional Officers
2700 S, California
Chicago, Illinois 60608

III. Exhaustion of Administrative Remedies

You are required to exhaust all your available administrative remedies before bringing an action in federal court.

- A. Is there a grievance procedure available at your institution?

YES NO If there is no grievance procedure, skip to F.

- B. Have you filed a grievance concerning the facts in this complaint?

YES NO

- C. If your answer is YES:

1. What steps did you take?

I filed a Grievance
Concerning my attack and Injuries.

2. What was the result?

Promised Pending due^{to} no
final disposition being given

3. If the grievance was not resolved to your satisfaction, did you appeal?

What was the result (if there was no procedure for appeal, so state.)

I've tried to no avail to
obtain a first reply, no results
have come about

- D. If your answer is NO, explain why not:

There is a lack of response
from County Grievance board.

E. Is the grievance procedure now completed? YES NO

F. If there is no grievance procedure in the institution, did you complain to authorities? YES NO

G. If your answer is YES:

1. What steps did you take?

Not Applicable

2. What was the result?

N/A

H. If your answer is NO, explain why not:

I've tried to on the jail level have my grievance heard, I've been forced to seek federal Civil action.

IV. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court (including the Central and Southern Districts of Illinois):

- A. Name of case and docket number: Phillip Gregory v. City of Chicago
et. al # 04 C 4483
- B. Approximate date of filing lawsuit: May 2004
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: Phillip Gregory
- D. List all defendants: City of Chicago, Chicago Police Dept.
John Doe's 1-4, Phillip Cline
- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): U.S. District Court, Northern Dist
- F. Name of judge to whom case was assigned: Judge Kennelly,
Magistrate Sidney I. Schenkler
- G. Basic claim made: Excessive Force, Racial degredation
Violations of Civil Rights
- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): Still Pending

H. Approximate date of disposition: NONE, Still Pending

IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.

V. Statement of Claim:

State here as briefly as possible the facts of your case. Describe precisely how each defendant is involved. Include also the names of other persons involved, dates, and places. **Do not give any legal arguments or cite any cases or statutes.** If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

On the date of February 26th 2003 while
Confined in the Cook County Dept of Corrections
during the 3 p.m. through 11 p.m. Shift I was
Unreasonably and without cause, abruptly
Attacked by Cook County Sheriffs Officers
John Doe's 1 through 4, Said Cook County
Sheriffs Correctional Officers while Working
Under Color of State Law and in their
Individual Capacities and Official Capacities
Under direction of their Supervising Sargent
and Lt. threw me into a cell, and came
in afterwards and grossly and savagely
beat me, Said John Doe's 1-through 4 and %fulson
while being held by each at different times
beat me, Kicked me and stomped me repeatedly
in my face and upon my body causing severe
injury, Swelling, bruising, and as well they
left me bleeding and unconscious and then
locked me the room without concern for me

and my numerous injuries, all of this occurred
 while Supervising Personnel was Standing
 by, Sgt Latham the Supervisor Stood
 Idle and Watched her Correctional
 officers throw me into a cell and proceed
 into such to beat me up With ^{out} provocation
 Said John Does I-4 and C.O. fulson
 Intentionally without Justifiable Cause
 while Working Under Color of State law
 and as well a County Sheriff of COOK
 County's Widespread Policy and Customs
 each in his official and also Individual
 capacity Committed a Wreckless act
 of assault against me to force me to
 Accept below Standard incarceration and
 to stop me from Complaining about my
 Needing Medical Attention for injuries
 I endured from my Chicago Police
 department arrest, Said Sheriffs Staff
 caused more Severe injuries and also
 have Subjected me to Mental injury
 Said 3-11 p.m. Shift Supervisors Lt. Brogan

and his staff of personnel Sgt Latham
and C.O. fulson,, and John Does 1-4
have undertaken in Gross intentional
acts of misconduct and physical assault,
No form of procedures for reporting
these acts have been properly implemented
My report to the Grievance board and
to internal affairs has not produced
any results and my Complaints have
been met with resistance leaving me
in further fear of retaliation for trying
to report the incident and physical assault.
I am seeking Judicial Intervention
And monetary damages for the Gross
and deliberate and Intentional acts
of misconduct and assaults, and for
the Widespread County Agencies Policy
of inflicting Unprovoked Attacks on the
individual Detainee's Confined in the Jail,
I am seeking redress for my injuries
that are not this time being hidden
and not reported by the Operating Staff.

(10).

Said New Jail director Callie Baird has Condoned acts of Violence to be deliberately committed against detainee's only to attract attention of the General Public in order to procure More Money for Manpower to run the Jail, NO Such manpower is needed because She has a Overflow of Staff earning money Without performing their Already Assigned duties, Callie Baird has failed to implement procedures of Criminal Charges Against her Staff whom are at random physically Assaulting detainee's especially detainees brought in on intake, I Was Physically Assaulted because of Callie Baird's Continuing Unwritten Policy that was put in place years before her takeover, Said Jail Director has Allowed and Specifically promoted infliction of physical Assaults to be Carried on and has Approved of her Investigative Staffs

to disregard the Grievances placed in
 on such widespread problems of physical
 assaults, Said Director has allowed
 Medical Staff to not report incidents,
 as well the staff on the 3-11 p.m. Shift
 where most of the detainee assaults
 occur, Never take detainee's to health
 care for treatment, I had to suffer
 from my Injuries until the next shift
 and after being taken to Cermak health
 care by C.O. Huston on the 11 to 7 am shift
 and once taken to health care after explaining
 how I endured my Injuries all medical
 treatment was stopped, I've reported my
 Complaints to outside County Officials
 yet the Office of the board of Commissioners
 and President John Stroger have as well
 disregarded my Complaints, Said officials
 have in their official and individual
 Capacities have deliberately maintained
 the Jail in a below standard operation, and
 have allowed violence to control its detainees.
 My last Grievance Control Number is 2004X0852.
 No response given

Said Cook County Sheriff Michael Sheahan While holding the Position as Sheriff in his Official and Individual Capacity Working Under Color of State Law has Specifically Allowed his Director of the Jail to Use deliberate Intentional Assault and Unprovoked Attacks on detainees to gain Public Attention to his Manpower Shortage Issue between the County Board. Said Sheriff has deliberately Condoned and directed his Staff to Use force Intentionally, Said Sheriff has Specifically Undermined the general Public and the entire detainee population at the Jail Claiming a Shortage of Staff has led to the Attacks of detainees, Said is Untrue. As can be seen by the fact that a total number of Staff involved With my Attack totaled 7 or more Staff Workers, Sheriff Sheahan has Self directed the Unwritten Code of Wreckless and Very deliberate Assaults, Without Care of my Safety he Maintains Such with a Deliberate indifference

VI. Relief:

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

I am seeking special independent medical care for injuries to my spine, and I'm seeking an monetary award of \$1,000,000.00 million dollars for the gross and deliberate assault and \$1,000,000.00 liability award against the County for Deliberate Deprerations of My Civil Rights

By signing this Complaint, I certify that the facts stated in this Complaint are true to the best of my knowledge, information and belief. I understand that if this certification is not correct, I may be subject to sanctions by the Court.

Signed this _____ day of _____, 20____

(Signature of plaintiff or plaintiffs)

(Print name)

(I.D. Number)

(Address)